

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

BRENDA L. HILL MYRICK,	:	
ADMINISTRATOR OF THE ESTATE OF	:	
GREGORY HILL,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 3:16cv952
v.	:	
	:	
NAPHCARE, INC., <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
SHERIFF C. T. WOODY, JR.,	:	
	:	
Cross-Claim Plaintiff,	:	
v.	:	
	:	
NAPHCARE, INC.,	:	
	:	
Cross-Claim Defendants.	:	

**MOTION FOR ENTRY OF JOINT PROTECTIVE ORDER**

Pursuant to Fed.R.Civ.P. 26 (c) Defendant and Cross-Claim Plaintiff, Sheriff C. T. Woody, Jr., and Defendants, Captain Jervon Johnson, Deputy Kimberly McCloud, Eric Everette, Sydney Felix, and Mason O'Roark, by counsel, hereby move for entry of a Joint Protective Order in the above-captioned matter. The reasons supporting this Motion are set forth in the accompanying Memorandum of Law.

SHERIFF C. T. WOODY, JR.  
CAPTAIN JERVON JOHNSON  
DEPUTY KIMBERLY McCLOUD  
ERIC EVERETTE  
SYDNEY FELIX  
MASON O'ROARK

By: \_\_\_\_\_ /s/ Jeff W. Rosen, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of March, 2017, I will electronically file the foregoing ***Motion for Entry of Joint Protective Order*** with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Angela Patterson, R.N., Marcel Pascal, RN, BSN, Beverly Daniels, LPN and  
Kelsey Green*

/s/ Jeff W. Rosen, Esq.

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